

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK (BUFFALO)**

UNITED STATES OF AMERICA,)	
)	
)	
Plaintiff,)	Case No. 12-cr-00125-WMS-HBS
)	
v.)	
)	
JAMIE LEE CHURCH,)	
)	
Defendant.)	
)	

UNOPPOSED MOTION REGARDING PROPOSED REVISED TERMS OF RELEASE

The Defendant, Jamie Lee Church, by and through her undersigned counsel, James T. Parkinson, and with the agreement of and no opposition from the Government through Assistant United States Attorney John E. Rogowski, moves this Honorable Court to consider the following:

1. On April 17, 2012, Ms. Church was charged with conspiracy to commit wire fraud in a sealed indicted returned by a grand jury in the Western District of New York.
2. Ms. Church is a citizen of the United Kingdom and has lived in Spain since 2006.
3. On November 4, 2013, Ms. Church was arrested near her residence in Spain pursuant to a warrant issued by the United States. The presiding Spanish Court released Ms. Church on her personal bond and defendant reported daily to her local court.
4. Following her arrest, Ms. Church authorized counsel to meet with Mr. Rogowski and advise Mr. Rogowski that she wished to waive a contested extradition proceeding and to cooperate.
5. On February 26, 2014, Ms. Church voluntarily waived the contested extradition proceeding from Spain to the United States, and was again released on personal bond

pursuant to an order of the presiding Spanish Court. Ms. Church reported daily to her local court.

6. On May 7, 2014, counsel for the Defendant moved this Honorable Court to consider proposed terms of release and bail, which had been agreed upon with counsel for the government, Mr. Rogowski. Agreement had been reached on the following proposed terms of bail and terms of release:

- Initial terms would require Ms. Church to surrender her passport and the court would set a bond of \$20,000, permitting Ms. Church to be released within the Western District of New York. Ms. Church would meet with Mr. Rogowski pursuant to her cooperation agreement during the week of May 12, 2014.
- Upon completion of her cooperation with the United States, the defendant and the government would jointly request that the Court permit the return of Ms. Church's passport to allow Ms. Church to return to her home during the pendency of this matter. She would have reporting obligations as imposed by the United States Probation Office.

7. On May 8, 2014, Jamie Lee Church surrendered herself to the United States Marshals Service at the Madrid Airport and transited to the United States, arriving in the Western District of New York on May 8, 2014.

8. On May 9, 2014, Ms. Church was interviewed by Pretrial Services, which rendered a recommendation that the defendant be released on \$20,000 cash bond and surrender her passport.

9. On May 9, 2014, Ms. Church was arraigned before this Honorable Court, which granted the Motion for Proposed Terms of Release and Bail and ordered \$20,000 bail.

10. On May 12, 2014, Ms. Church met with counsel for the government, Mr. Rogowski.

11. Counsel for the defendant has conferred with counsel for the government, Mr. Rogowski, about proposed revised terms of release for Ms. Church, and have reached agreement about recommended terms of release and bail.

12. Mr. Rogowski authorized counsel for the defendant to represent that agreement was reached on the following proposed revised terms of release and to jointly request that:

- The Court permit the return of Ms. Church's passport to allow Ms. Church to return to her home during the pendency of this matter, to appear at hearings before this Honorable Court as required. Ms. Church will have the following reporting obligations: (1) in the event of any change to her residence address or mobile telephone number Ms. Church shall, through her counsel, immediately advise counsel for the government; and (2) Ms. Church shall communicate regularly, but no less than weekly, via email to her counsel confirming that the residence address and mobile telephone number remain valid.

Dated: May 12, 2014

Respectfully submitted by,

/s/ James T. Parkinson

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CERTIFICATE OF SERVICE

I hereby certify that on May 12, 2014, I electronically filed the foregoing **UNOPPOSED MOTION REGARDING PROPOSED REVISED TERMS OF RELEASE** with the Clerk of the District Court using the CM/ECF System, which sent notification of such filing to John E. Rogowski, Assistant United States Attorney.

_____/s/ James T. Parkinson_____

James Parkinson, Esq.
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